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 Color CRT Co., Ltd.*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Case No.: 3:07-CV-5944
 MDL NO. 1917 – ALL CASES

DECLARATION OF
 AYUMO KINOSHITA
 IN SUPPORT OF BEIJING
 MATSUSHITA COLOR CRT
 CO., LTD.'S MOTION TO DISMISS
 THE COMPLAINT FOR LACK
 OF PERSONAL JURISDICTION

ALL ACTIONS

Before the Honorable Samuel Conti

I, Ayumu Kinoshita, hereby declare as follows:

1. I am a citizen of Japan, currently residing in Japan.
 2. I was an employee of Matsushita Toshiba Picture Display Co., Ltd. ("MTPD")
 from October 1, 2003, to May 15, 2006. From April 2005 to May 2006, while I was an
 employee of MTPD, I was stationed at Beijing Matsushita Color CRT Co., Ltd. ("BMCC"), in
 Beijing, as an MTPD resident sales engineer. During this time period, I had responsibility for
 sales of Color Picture Tubes ("CPTs") to Chinese TV manufacturers.

3. In May 2006, I became an employee of BMCC, where I was employed until
 March 2008. During my employment by BMCC, I was stationed in Beijing and my position was
 Assistant General Manager in the Sales and Marketing Department. I was responsible for sales

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1 of CPTs to overseas customers (customers located outside of China) and Panasonic/Toshiba's
2 TV manufacturing companies in China, which were Panasonic AVC Networks Shandong Co.,
3 Ltd. and Toshiba Dalian Co., Ltd.

4 4. After my employment by BMCC, on March 1, 2008, I became an employee of
5 Panasonic AVC Networks Company, which was a division company of Matsushita Electric
6 Industrial Co., Ltd. in Japan. Further, on January 1, 2013, I was transferred to the Corporate
7 Planning Group, Corporate Strategy Division, Panasonic Corporation, where I am still employed.
8 My current title at the group is a councilor responsible for planning of the corporation.

9 5. This declaration is submitted in support of BMCC's motion to dismiss certain
10 complaints filed in In re: Cathode Ray Tube (CRT) Antitrust Litigation, No. 3:07-CV-5944, N.D.
11 Cal., on the grounds of lack of personal jurisdiction. Each statement made in this declaration is
12 based on facts within my personal knowledge, my knowledge or review of various records of
13 BMCC, or consultation with Panasonic.

14 6. During the entire time I was stationed at BMCC as an MTPD employee, and
15 during the entire time I was employed by BMCC, fifty percent (50%) of the shares of BMCC
16 were owned by MTPD, a subsidiary of a predecessor company to Defendant Panasonic
17 Corporation ("Panasonic"). The other shareholders were non-defendants Beijing Orient
18 Electronics (Group) Co., Ltd.; China National Electronics Import and Export Beijing Company;
19 and the Beijing Yayunchun Branch of Industrial and Commercial Bank of China, Ltd. MTPD
20 sold its shares of BMCC on December 24, 2009.

21 7. BMCC is a company organized under the laws of the People's Republic of China
22 with its principal place of business in Beijing, China. BMCC's books, records, and personnel are
23 all located in China.

24 8. BMCC at no time from March 1, 1995 (when the purported class period began) to
25 December 24, 2009 (when MTPD sold its shares) had any subsidiaries.

1 9. BMCC manufactured Cathode Ray Tubes (“CRTs”), meaning CPTs and Color
2 Display Tubes (“CDTs”), only at its facility in Beijing, China. BMCC never manufactured
3 electronic devices containing CRTs, such as televisions or computer monitors.

4 10. BMCC stopped manufacturing CDTs in 1999 and CPTs in 2009, after which it
5 discarded its CRT manufacturing assets.

6 11. At no time from March 1, 1995 (when the purported class period began) to
7 December 24, 2009 (when MTPD sold its shares) has BMCC been registered or licensed to do
8 business anywhere in the United States.

9 12. BMCC at no time from March 1, 1995 (when the purported class period began) to
10 December 24, 2009 (when MTPD sold its shares) owned, used, processed, or otherwise had any
11 rights to any real property anywhere in the United States.

12 13. BMCC at no time from March 1, 1995 (when the purported class period began) to
13 December 24, 2009 (when MTPD sold its shares) manufactured CRTs, or any other products,
14 anywhere in the United States.

15 14. BMCC at no time from March 1, 1995 (when the purported class period began) to
16 December 24, 2009 (when MTPD sold its shares) operated any offices, plants, or warehouses
17 anywhere in the United States.

18 15. BMCC at no time from March 1, 1995 (when the purported class period began) to
19 December 24, 2009 (when MTPD sold its shares) had a shipping address, telephone listing, or
20 bank account anywhere in the United States.

21 16. BMCC at no time from March 1, 1995 (when the purported class period began) to
22 December 24, 2009 (when MTPD sold its shares) paid any income or property taxes anywhere in
23 the United States.

24 17. BMCC at no time from March 1, 1995 (when the purported class period began) to
25 December 24, 2009 (when MTPD sold its shares) employed anyone anywhere in the United
26 States.

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18. BMCC at no time from March 1, 1995 (when the purported class period began) to December 24, 2009 (when MTPD sold its shares) directed any advertising, marketing, or promotion anywhere in the United States or otherwise solicited any business anywhere in the United States. BMCC's website was only in Chinese.

19. BMCC at no time from March 1, 1995 (when the purported class period began) to December 24, 2009 (when MTPD sold its shares) had a registered agent or other person authorized to accept service of process anywhere in the United States.

20. BMCC at no time from March 1, 1995 (when the purported class period began) to December 24, 2009 (when MTPD sold its shares) maintained any inventory of products anywhere in the United States.

21. The majority of CRTs manufactured by BMCC were sold and shipped to customers in China.

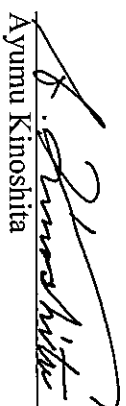
22. BMCC at no time from March 1, 1995 (when the purported class period began) to December 24, 2009 (when MTPD sold its shares) sold or shipped any CDT to any customer in the United States.

23. BMCC never sold any CPTs into the United States. Certain Panasonic entities purchased a limited amount of CPTs from BMCC FOB China, which CPTs the Panasonic entities sold in the United States. After the Panasonic entities purchased the CPTs from BMCC, BMCC had no control over where they would be sold. Panasonic determined the volume and price of such sales. BMCC relinquished control of the CPTs in China and was not responsible for their ultimate delivery to the United States or elsewhere.

24. BMCC has never owned an interest in MTPD or Panasonic or any of their predecessors, subsidiaries, or affiliates. BMCC has never exercised any control over MTPD or Panasonic or any of their predecessors, subsidiaries, or affiliates. Neither MTPD nor Panasonic nor any of their predecessors, subsidiaries, or affiliates have acted as agents of BMCC in the United States.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct, and that this declaration was signed this 30 day of October, 2013, in

3 Osaka

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Ayumu Kinoshita

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